

In The United State District Court
For the District of Delaware

Kenneth Holland,
- Plaintiff

v.

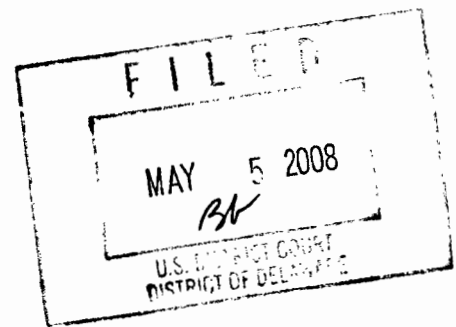
C H No. C5-464 (SLR)

Stanley Taylor, et al.,
- Defendant

Adam Bramble,
- Defendant,
- counter Plaintiff,

v.

Kenneth L Holland,
Plaintiff,
- counter Defendant,



Plaintiff's reply to Defendant's
response to Motion to Compel

Plaintiff Kenneth L Holland, respectfully state the following in support of his position:

1. State Defendant's have had ample time to answer Plaintiff's third set of interrogatories. On top of all this, the defendant's have tried to stone-wall Plaintiff by trying to hide behind the words

security and privilege.

(a.) On or about January 4, 2008, Plaintiff file a Motion for Extension of time, to complete discovery.

(b.) Nearly one month later, Plaintiff sent through U.S. mail a copy of his third set of interrogatories, one to the defendant's and one to the Clerk's office, to help prepare the defendant's and their counsel of what the Plaintiff wanted full disclosure of, as "good faith", because if and when Plaintiff Motion is granted, both party's would have had a limited time to answer and respond.

(c.) On March 14th, 2008, Plaintiff's motion for Extension of time to complete discovery and the papers in connection with, was granted. Ordering that all discovery in this case shall be completed on or before May 1st 2008.

2. Plaintiff has had no opportunity to confer or attempt to confer with the party in making the disclosure as he "is" incarcerated and unable to have meetings with the defendant's or to even call their counsel.

(a) State defendant's was fully aware that the Extension only limited the discovery time to 45 days. at the time Plaintiff filed the motion to compel, 43 days had

past with no reply from the defendant's, leaving only 3 days until the deadline that discovery end.

3. It is obvious that the defendant's have the ability to answer submission in a timely manner when it suits them, since it only took "two" days for the defendant's were as diligent with the Plaintiff's third set of interrogatories, the Motion to Compel would have been mute, the Plaintiff have given the defendant's majority of the 45 days to answer, but they still would rather fight this motion instead of answering said interrogatories.

4. Defendant's inaction and deceptions, as well as their desire to avoid answering questions that are actually relevant in the instant action requires this Honorable Court to grant Plaintiff's Motion to Compel, so that this case can proceed instead of being mired in stone-walling and procrastination.

Wherefore, the Plaintiff respectfully request that this Honorable Court grants his Motion to Compel, and order that the defendant's to "answer" within 15 days. and further delay, stone-walling, or procrastination on part of the defendant's, without showing [REDACTED] good cause for the delay, a order of judgment against the defendant's should be order.

and failure to answer Plaintiff's motion Compelling discovery's after the 15 days, Plaintiff request that sanctions be placed on the defendant's.

Kenneth Holland

Kenneth L. Holland #1164860
Delaware Correctional Center
1181 Paddock Road
Smyrna, De 19977

Certificate of Service

I, Kenneth L. Holland, hereby certify that I have served a true

And correct cop(ies) of the attached: Plaintiff's reply to Defendant's
Response to Motion to Compel upon the following
parties/person (s):

TO: Office of the Clerk
United States District Court
844 N. King St. Lockbox 18
Wilmington DE 19801 - 3570

TO: Catherine Damavandi
Deputy Attorney General
State Department
820 N French St. 6TH Floor
Wilm. DE 19801

TO: _____

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 2 day of May, 2008

Kenneth Holland

Imogene Holland
SBI# 162800 UNIT DE
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

Office of the Clerk

United States District Court
844 N. King St. Room 18
Wilmington, De 19801 - 3570



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